

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**KNIFE RIVER CORPORATION-
SOUTH,**

Plaintiff,

V.

**ZURICH AMERICAN INSURANCE
COMPANY and AMERICAN
GUARANTEE AND LIABILITY
INSURANCE COMPANY,**

Defendants.

CIVIL ACTION NO. 3:21-cv-01344-B

**PLAINTIFF KRC'S NOTICE OF SETTLEMENT, MOOTNESS OF
CASE/CONTROVERSY AND SUGGESTED STAY TO IMPLEMENT
PARTIES' SETTLEMENT AND DISMISSAL FILINGS**

unnecessary expense. Plaintiff KRC anticipates that the parties will be able to finalize the full written settlement agreement and submit dismissal papers within 30 days.

3. **Suggested stay to implement settlement.** Accordingly, Plaintiff KRC respectfully requests that the Court take notice of the parties' settlement as described *supra*, take notice of the mootness of the underlying case and controversy, and consider issuing a 30-day stay order (staying all proceedings and any and all deadlines including - without limitation - response and reply periods) to implement the parties' settlement agreement and submission of dismissal filings.

Dated: May 25, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of May, 2022, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic filing system sent a notice of electronic filing to the attorneys of record below who have consented in writing to accept this notice as service of this document by electronic means.

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